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| **Work Plan For Work Group Meetings** | | | | |
| **WHAT** | **ADDITIONAL RWG/Non-NPDES DISCUSSION?** | **RESOLUTION/REMAINING QUESTIONS** | **TASKS** | **DUE DATE** |
| **RWG ITEMS** | | | | |
| **Agenda** | No | -Need to finalize June and July agenda items  -leads develop objectives and PPTs | -Draft agenda for July --Send out for 3 govt. review | -7/6? (Donna) |
| **Intake Credit Rule** | No | -DEQ sent e-mail to RWG 1/22/10 with final language | -Finalize Issue Paper  -RPA IMD: Determine how to do the calculations in the IMD and change boilerplate language in permits to allow intake credits | -completed (Spencer)  -XX/XX (Spencer) |
| **HHC Schedule** | No | -DEQ sent e-mail to RWG 1/22/10 with final language based on existing rule language, and does not include new definition language  -IMD finalized  - Lawsuit settled: Neil believes we do not need a separate provision for HH in the rulemaking, although there are concerns from Annette that the pending ESA action could potentially cause problems in the future. Jannine thinks it could be confusing w/ a current provision for both ALC and HHC in the regs, along w/ a separate one for HHC. | -Draft section in Issue Paper  -Finalize Issue Paper  -Provide update at July 15 meeting | -Aug? (Jane)  -Sept (Jane)  -Annette? |
| **Variances** | Yes—July | -Need to look at variance approvals from states outside GLI  -Expand preamble language re: judicious use of variances for ALC  -issue paper: GLI applicability and priority renewals language | -Update Issue Paper based on comments received from RWG  -Respond to comments for July meeting (if time allows) | -7/6 (Andrea)  -7/6? (Andrea) |
| **Restoration Standards** | No | -The availability of restoration standards does not go beyond current authority  -Most feasible if done w/in the context of a TMDL  -Would need rulemaking for each interim criteria developed | -Finalize Issue Paper based on RWG discussion on 4/27 | -completed (Andrea) |
| **Background Pollutants**  **Broad Spectrum General Permits**  **De Minimus**  **MDV** | No  Maybe - Aug  No | -What does “ assuming instantaneous complete mix” mean?  -Work with EPA to word as a standards provision.  -provision should be approvable and defensible if challenged in court  -DEQ will not pursue a MDV at this time.  -If pursued, we would need to provide more detail on non-contact cooling facilities, scope of pollutants (reference Table 20 list and criteria), and alternative analysis—i.e. why is each alternative more environmentally damaging than multiple pass cooling? This would be part of a supporting document. | -Update section in Issue Paper  based on RWG discussion on 4/27  -Draft IMD?  -  Send list of 303d listed pollutants for Columbia and Willamette to Kathryn, Rich, Myron and Michael. Ask which pollutants they are particularly concerned about. The purpose of this request is that it will help us respond to the request to test how the background pollutant allowance would work at 1% and 3% with the dilution flows we are recommending.  -Do calculations once we get a response.  Neil thought Rob and Steve would have the data we need on ambient conditions.  -provide a narrative to accompany the existing charts on pages 19 and 20 of issue paper  -Revise section in Issue Paper  -Send out for internal review  -Draft final issue paper  -Finalize Issue Paper | -completed (Spencer)  -XX/XX (Spencer)  -ASAP (Deb)  -XX/XX  (Spencer/Rob/Steve)  -XX/XX (Spencer)  -XX/XX (Deb)  -XX/XX (Deb)  -Aug? (Deb)  -completed (Andrea) |
| **Offsets/Trading** | No | -RWG, DEQ, and EPA feel that offsetting toxics which would allow a criteria exceedance in some portion of the waterbody would be challenging to do—will not pursue  -DEQ most likely has current authority to do offsets/trading in a general manner | -Develop draft Issue Paper  -Finalize issue paper | -XX/XX (Andrea?)  -XX/XX (Andrea?) |
| **Delayed Implementation of Criteria** | No | -Address specific implementation questions  -Analyze whether or not using a higher risk level in the short term would address compliance issues. | -Finalize section in issue paper by updating RWG discussion section  and analyze 10-5 risk level using SAIC report—17.5 vs. 175 and fold into the issue paper | -Aug(Andrea) |
| **Using a Toxics Reduction Plan to meet WQBEL/WQS requirements** | Yes-July | -incorporating P2 concepts into variance reg language.  -ACWA meeting 7/14—supportive of concept, but may want to add additional info.  -follow up w/ RPA determinations? | -Send updated version to RWG w/ meeting materials | -7/8 (Andrea) |
| **Human Health Criteria Table** | Yes-via e-mail | -Most likely RWG review can be accomplished via e-mail  -Anticipate taking 3 solid weeks to complete given criteria complexity and making the table more user friendly. Need to determine effective dates—HHC vs ALC vs DEQ and EPA effective dates  -IRT, RWG, permit writer review  -Get info from EPA on As IRIS update. New RfD for acrolein and phenol?  RSC issue needs to be resolved  -Do we need an IMD, or could the Issue Paper provide the details on specific pollutants (e.g. if EPA withdrew specific toxic criteria, or other special circumstances; footnotes, calculations, etc.). | -Draft criteria table  -Final criteria table  -Draft section in Issue Paper  -Finalize issue paper | -7/23 (Andrea)  -Aug. (Andrea)  -Aug (Andrea)  -Sept (Andrea) |
| **Separate Rulemaking for As, Fe, Mn** | No | (Refer to Deb’s timetable) |  |  |
| **Tools Matrix** | Yes-July, Aug., Sept. | -updated tools matrix which indicates status | -update tools matrix—if we determine that we will NOT have a separate provision for HHC schedule, then it will need to be updated for July. | -7/8 (Andrea) |
| **NPDES Issue Paper**  Sections I, II, III | No | -Section III more important to finish first | -Draft section III  -Draft section I, II | -completed (Spencer)  -early Oct. (Andrea w/ assistance from Deb) |
| **Misl Implementation** |  | -Think about how to transition for permit renewal applications already in house | -Figure what the standard condition means with respect to applicability of new standards immediately.  -Evaluate whether permit shield language needs to be amended 014-0080 | -XX/XX (Annette)  -XX/XX (Annette) |
| **NON-NPDES RULEMAKING ITEMS** | | | | |
| **Agenda** | No | -Need to finalize June and July agenda items  -leads develop objectives and PPTs | -Draft agendas for June and July --Send out for 3 govt. review  -Final agendas  -send updated monthly agenda table to RWG and non-NPDES work groups | -6/9 (Andrea)  -6/14 (Andrea)  -6/22 (Andrea)  -6/14 (Andrea) |
| **Implementation-Ready TMDLs** | Yes-June, July |  | -Update issue paper based on 5/20 discussion and e-mail feedback.  -issue paper/materials for non-NPDES work group distribution | -XX/XX (Koto)  -6/22 (Koto) |
| **Pretreatment Subcommittee** | Yes-June, July | -Tiffany meeting with subcommittee members | -draft issue paper for non-NPDES work group distribution | -6/22 (Tiffany) |
| **Antidegradation** | Maybe-July | -Neil said several states were working on NPS antideg policy  -DEQ to determine if updating the antideg IMD to include a NPS section is sufficient (i.e. no rulemaking), based on responses from non-NPDES members. | -update issue paper based on non-NPDES 5/20 discussion and e-mail feedback  -finalize issue paper  -Feedback loop to work group re: decision  -draft NPS antideg section in IMD | -XX/XX (Deb)  -XX/XX (Deb)    -XX/XX (Deb)  -XX/XX (Deb) |
| **Sediment and Toxics** | Yes-June | -Gene and Josh to meet w/ Neil to discuss whether or not sediment control will be part of this rulemaking | -Update issue paper based on non-NPDES 5/20 discussion  -Feedback loop to work group members if June last discussion on sediment  -issue paper/materials for non-NPDES work group distribution | -XX/XX (Josh)  -XX/XX (Gene)  -6/22 (Josh) |
| **OAR 340-041 Rule Language** | Yes-June, July? |  | -update issue paper based on non-NPDES 5/20 discussion and e-mail feedback  -issue paper/materials for non-NPDES work group distribution | -XX/XX (Koto)  -6/22 (Koto) |
| **Response to May Meeting Comments** |  |  | -group like comments and respond | -XX/XX |
| **Other Items** | | | | |
| **Fiscal Impact Statement** | Yes-Aug., Sept. | -Need to work w/ Maggie, Adam, etc. on what is needed here  -IRT review  -Will inclusion of the non-NPDES action items affect the results from the FIIAC report? Maggie says we can do separate FIS’s for NPDES and non-NPDES actions | -Materials for Aug. work group discussions (will not have actual paper work for review)  -draft paperwork for NPDES actions (include review by Adam)  -draft paperwork for non-NPDES actions (include review by Adam)  -Send draft to work groups for review and comment for Sept. meeting (need more review time than the typical 7 days)  -Respond/revise paperwork based on stakeholder feedback | -8/10 (All)  - late July (Andrea)  - late July (Koto, Gene, Deb?)  -9/1 or 9/8 (Andrea)  -10/12? (Andrea + others) |
| **Other Rulemaking Documents** | No | -Land Use Evaluation Statement  -Relationship to Federal Requirements Questions  -Rulemaking Announcement for Notice Package  -Rule Implementation Plan Checklist and Implementation Plan  -Strikeout Rule Revisions  -Other Supporting Documents (Issue Papers, etc.) | -Complete draft docs  -Submit draft docs w/ rule package  -Finalize docs (after internal review) for SOS submission | -10/20 (Andrea + others)  -10/27 (Andrea)  -12/8 (Andrea + others) |
| **Communication Plan** | No |  | -Draft plan  -meeting with Christine S. to discuss legislative connections | -done (Andrea)  -6/9 (Andrea) |
| **Work Plan and Timelines** | N/A | -Each team member is responsible for updating work plan components, due dates, etc. for which they are the lead on | -update individual tasks on this work plan and on the overall major milestones for rulemaking which are both found in Share Point  -update overall timeline, work plan and tracking—MS Project will be installed 3/29 | -as needed (all)  -as needed (Andrea) |

**\*Table does not include all intermediary steps**